



DRAFT POLICY FOR TOXICITY ASSESSMENT AND CONTROL

State Water Board – Thank you for allowing the general public to comment on your policy for toxicity assessment and control. One major problem I see occurring in the water treatment industry is the relevance of enforcing fish bioassay without consideration of cost impact and improvement to actual receiving waters. For example, ion exchange is a common methodology to remove iron and manganese from groundwater in order to meet discharge standards. However, the same ion exchange resins can also remove chloride. Without chloride, you will likely not have passing survival rate for fish bioassay test. In order for industry to meet the survivability, they end up adding chloride to discharged water. Once discharged, these waters are combining with waters already known to have very high chloride issues that only exacerbate the problem further. These considerations to an overall improvement of receiving waters should be considered on enforcement of fish bioassay testing. Our goal should be improvement of the overall water quality shed and not a point source which will also benefit industry by not adding additional costly process streams to their treatment trains.

Thank You